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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
JASON HOANG and YANG HUA MEI,)
)
Defendant.)
_____)

No. CR 08-0238 MHP

STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME FROM JUNE
16, 2008 THROUGH JULY 7, 2008

On June 16, 2008, the parties in this case appeared before the Court for a status conference. The parties stipulated and the Court agreed that time should be excluded from the Speedy Trial Act calculations from June 16, 2008, through July 7, 2008, for effective preparation of defense counsel. The parties represented that granting the continuance was the reasonable time necessary for effective preparation of defense counsel, taking into account the exercise of due diligence. *See* 18 U.S.C. § 3161(h)(8)(B)(iv). The parties also agreed that the ends of justice served by granting such a continuance outweighed the best interests of the public

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and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A).

SO STIPULATED:

JOSEPH P. RUSSONIELLO
United States Attorney

DATED: June 20, 2008

/s/ Owen Martikan
OWEN P. MARTIKAN
Assistant United States Attorney

DATED: June 19, 2008

BARRY J. PORTMAN

/s/
RONALD TYLER
Attorneys for Jason Hoang

DATED: June 20, 2008

/s/
ALAN DRESSLER
Attorney for Yang Hua Mei

As the Court found on June 16, 2008, and for the reasons stated above, an exclusion of time from June 16, 2008, through July 7, 2008, is warranted because the ends of justice served by the continuance outweigh the best interests of the public and the defendant in a speedy trial. *See* 18 U.S.C. § 3161(h)(8)(A). The failure to grant the requested continuance would deny defense counsel the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and would result in a miscarriage of justice. *See* 18 U.S.C. § 3161(h)(8)(B)(iv).

SO ORDERED.

DATED: July 3, 2008

